



jurisdiction over Plaintiffs' suit on both standing and claim channeling grounds. Opinion and Order, ECF No. 66.

3. On March 31, Plaintiff filed an Amended Complaint, ECF No. 77. Defendants' current deadline to respond is April 14, 2025. Fed. R. Civ. P. 15(a)(3) (explaining a response is due "within 14 days after service of the amended pleading").

4. There is good cause for a 24-day extension of the time to respond. Undersigned counsel has a substantial current workload, including having three motions to dismiss and two replies due for filing in the next thirty days, as well as various other matters demanding undersigned's attention. Undersigned also returned from leave on April 8, and did not have access to email, as he was on leave outside the country, when Plaintiffs filed the amended complaint. The other members of the team also have substantial commitments of a similar nature. Together, these circumstances constitute good cause for an extension of 24 days (until May 8, 2025) to respond to the Amended Complaint.

5. The requested extension will not delay the proceedings or otherwise prejudice any party.

6. On April 8, 2025 Plaintiffs consented to the May 8, 2025 extension request.

For the foregoing reasons, good cause exists for the Court to grant this motion. Defendants respectfully request that the Court grant the requested extension of time until May 8, 2025 for Defendants to respond to the Amended Complaint

Dated: April 11, 2025

Respectfully submitted,

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Acting Assistant Attorney General

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/s/ Jason Altabet

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**CERTIFICATE OF SERVICE**

On April 11, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court for the District of Massachusetts, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Jason Altabet  
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